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21 May 2020

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VIA ECF

Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Epifanio et al v. Delancey's Ludlow LLC. et al.
Case 1:19-cv-07593 (JMF) (JLC)
Our File No. 17709.009

Dear Judge Furman:

As you are aware, our firm represents Defendants in the above-captioned matter. As associate attorney Danielle Rosenberg has been furloughed, I recently assumed lead representation of Defendants in this matter. In addition our firm has transitioned to a totally remote operation and has also had to lay off certain staff members. I have had limited opportunity to review the file and acquaint myself with this matter. Accordingly, I respectfully request that the Court grant an extension of two weeks to file the joint status report initially due today (see ECF no. 44, p. 5; ECF No. 54). This is the first request of the sort. I have consulted with Plaintiff's counsel regarding the request, and Plaintiff's counsel consented to requesting an adjournment, seeing no prejudice therein to Plaintiff.

Furthermore, Plaintiff's counsel and I have conferred and he has consented to Defendants' request to extend the discovery deadline, which ends today (see ECF No. 44), by 45 days.

On behalf of Defendants, I thank the Court for its attention to this matter.

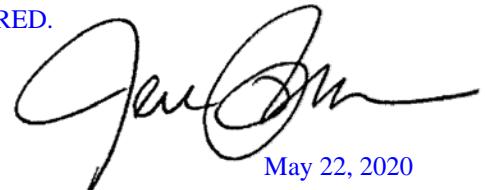
Respectfully submitted,

s/Marshall B. Bellovin
Marshall B. Bellovin
Counsel for Defendants

CC: Jordan Gottheim, Esq.. (via ECF)
Counsel for Plaintiff

Ordinarily, motions for extensions of time must be filed at least 48 hours before the relevant deadline. Nevertheless, the application is GRANTED and the discovery deadline is hereby extended to July 6, 2020. In light of that extension, the pretrial conference is ADJOURNED to July 7, 2020, at 3:00 p.m. In accordance with the Case Management Plan, the joint status report shall therefore be filed by the Thursday before the conference. The Clerk of Court is directed to terminate ECF No. 55.

SO ORDERED.



May 22, 2020